

Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

**SHERMAN DIVISION**

JLR GLOBAL LLC, et al

Plaintiffs,

v.

CIVIL ACTION NO.: 4:22-cv-559  
JURY TRIAL DEMANDED

PAYPAL INC.,

Defendant.

**DECLARATION OF JENNIFER RYAN**  
**REGARDING LIST OF 30 ATTORNEYS & TIMELINE**

I, the undersigned, make this declaration to the best of my knowledge, and do so under the penalty of perjury.

After my attorney, Ron Burns, was forced to withdraw from my case due to the cost of arbitration that I could not afford to pay, I contacted the following attorneys and spoken to the attorneys or their staff, and in most cases, presented them with case pleadings and met with these attorneys over the phone and/or in person. I have had multiple discussions with most of these attorneys regarding my case in the diligent attempt to secure legal counsel in a way that I could afford.

My goal was first to find an attorney to handle the arbitration of my case on a contingency basis, and when I discovered that there were no attorneys willing to handle my case on a contingency basis, I attempted to consult with attorneys about taking my case on a retainer basis. The only attorney who agreed to take my case was attorney John Pierce, a Harvard Graduate, who estimated the cost to successfully arbitrate my case to be \$350,000. I then attempted to get a litigation loan to pursue the arbitration, but was denied funds. It was at that time that I gave up on the arbitration process in frustration.

31. Joe Sibley - Phone consultation
32. Lin Wood - Text
33. Libby Locke - Email & Phone consultation
34. Matt Davis - Phone consultation

### **2023 New Evidence Timeline**

#### **April 2023**

- Attorney Ron Burns withdrew from representing my case once it was referred to arbitration.

#### **April - June 2023**

- Called hundreds of resources and attorneys requesting representation for the PayPal Arbitration spending days, weeks, months trying to find adequate counsel.
- Took notes, spent hours strategizing, planning, networking, trying as hard as possible to secure representation for the PayPal arbitration.
- Met with several attorneys over the phone and in person to discuss their representation of me in the PayPal arbitration.
- Sent pleadings, emails and explanations to well over 30 attorneys locally and nationwide.

#### **June 2023**

- Contacted John Pierce, Attorney and was given an estimate for him to handle the arbitration on contingency for \$350,000.
- Applied for financing to handle the arbitration which was denied.

#### **August 2023**

- Gave up on the arbitration process.
- Experienced extreme frustration and hopelessness.
- Received a call from an attorney who mentioned that there are laws to protect people who cannot afford arbitration.
- Started researching the legal precedent regarding the affordability of arbitration.
- Started drafting the Motion to Reconsider Pro Se.
- Started the arbitration process with the AAA - Referred to Complex Case Side of AAA.
- Applied and received for a Hardship Waiver of fees with the AAA. (Roughly \$10,000.
- Secured an attorney, Mark Grosso, to handle my case on a contingency basis if the case stays in court.

#### **September 2023**

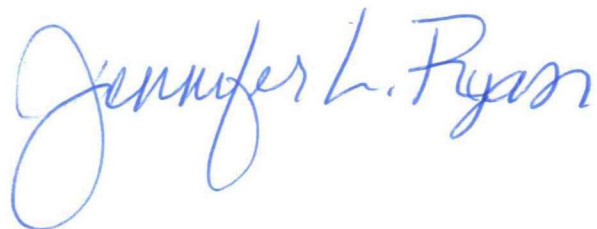
- Continued writing Motion to Reconsider Pro Se

October 2023

- Continued writing Motion to Reconsider Pro Se

November 2023

- Filed the Motion to Reconsider Arbitration Pro Se

A handwritten signature in blue ink that reads "Jennifer L. Ryan". The signature is written in a cursive style with a large, looping initial "J".